

MEMORANDUM  
TO THE HONORABLE DORA L. IRIZARRY  
United States District Judge

received  
in Chambers of  
U.S. District Judge  
DORA L. IRIZARRY

JAN 14 2011

RE: KIM GOODWINE  
DOCKET NO.: 10-CR-452

On November 4, 2010, the above-named defendant pleaded guilty before Your Honor to Assault on a Federal Officer. At that time, the Court ordered a presentence investigation to be conducted, and the investigation was assigned to the undersigned, Sr. U.S. Probation Officer Patricia Sullivan. In addition, the Court had set a disclosure date of February 3, 2011.

As the defendant resides currently in Georgia, the undersigned conducted the presentence interview via telephone with the defendant and Defense Counsel on December 7, 2010. Following the interview, the undersigned mailed the requisite waivers that are needed to verify the defendant's personal history information to the address of record; however, to date, the defendant has not returned the waivers to the Probation Department. On January 3, 2011, the undersigned contacted Defense Counsel to advise of the situation. Counsel contacted the defendant, and she assured her attorney that the waivers would be returned to the Probation Department. The undersigned contacted Counsel again today, and was informed that the defendant is unable to mail them out today because she is "iced in." This situation has caused a delay in the presentence investigation, and at this juncture, we respectfully request that a new disclosure date be set for on or after March 7, 2011. Notably, Counsel is in agreement with the adjournment request. This will provide sufficient time to complete the presentence report, and will provide the Government and Defense Counsel with ample time to review the report. We apologize for any inconvenience that this delay may cause for the Court.

Respectfully Submitted,

Eileen Kelly  
Chief U.S. Probation Officer

Prepared by: Patricia A. Sullivan  
Patricia A. Sullivan  
Senior U.S. Probation Officer  
(347) 534-3742

Date: January 13, 2011

cc: Hilary Jager, Esq.  
Deirdre Von Dorum, Esq.

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\_\_\_ Adjournment Request Granted

\_\_\_ Adjournment Request Denied

New Sentence Date/Special Instructions: \_\_\_\_\_

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The Honorable Dora L. Irizarry  
United States District Judge

\_\_\_\_\_  
Date